

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

16 Cr. 207 (KBF)

v.

BORIS NAYFELD

**DECLARATION OF BORIS NAYFELD IN SUPPORT OF MOTION TO
MODIFY CONDITIONS OF SUPERVISED RELEASE**

Boris Nayfeld, hereby declares the following, pursuant to 28 U.S.C. §1746:

1. I am the Defendant in the above-captioned matter.
2. I submit this Declaration in support of my Motion to Modify the Conditions of my Supervised Release so that I may travel to Russia.
3. I am natively from Russia, and am now 70 years of age.
4. I have no family left in Russia, nor any family or friends left overseas.
5. Since April 2018, I have been undergoing a divorce in the United States, which will ultimately require division of marital property (as requested in my divorce papers). I own a house in Staten Island, New York, and apartment in Sunny Isles, Florida – both marital property.
6. In 2004, my mother, Ekaterina Petrovna Mironova, passed away. She was buried in the town of Klin Moscovsky in Moscow Region.
7. I have no siblings or other family members who can look after my mother's grave anymore.
8. In my culture, it is extremely important that someone look after the grave of a loved one or family member. It is important to care for the grave and

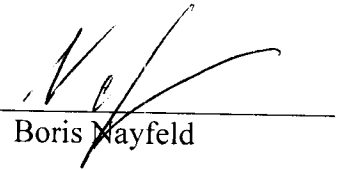
gravesite of a family member because it is a sign of respect to the person who passed.

9. This request is being made now because my stepfather, who was married to my late mother, passed away, leaving no one left to care for my mother's grave.
10. I used to send money to my late stepfather after my mother passed, that he was to use to hire people to have the grave cleaned of weeds and do restoration work on the memorial headstone.
11. I learned, subsequent to his death, that my stepfather was actually using the money to buy alcohol, which ultimately killed him (he died of alcoholism). My mother's gravestone and site is hence in very bad shape.
12. It would bring great shame upon me if I was unable to look after my mother's grave and it was instead left to fall prey to the neglect that it befell while my stepfather was supposedly tending to it.
13. If I am able to travel to Russia even briefly, I will be able to arrange for the routine care of the gravesite by some local person.
14. I am not involved in any criminal activity any longer, nor – as the government acknowledged at my sentencing – am I interested in or likely to commit any crimes given my now sullied reputation.
15. As I have aged, been going through a divorce, and lost my mother (with whom I was very close), I have severed my ties with any of the persons with whom I was involved prior to my arrest.

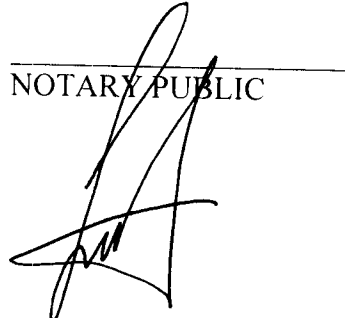
16. I have a great deal of remorse for my previous actions—not simply because they put me where I am today, but because I have mended my ways, and desire to move on with my life.
17. In the past, I have asked for and received permission to travel for various reasons. I have never absconded or failed to return when due.
18. There has been publicity following my 2016 arrest, as a result of which my reputation in my community has suffered. I have become isolated; many people will not socialize with me. I no longer have contact with any of my former friends.
19. I do not do or deal any kind of drugs, and am in no need of medical care or educational services. I have no recent or past history of drug or alcohol abuse.
20. I have been living on a Social Security benefit of \$840 a month and have been attempting to secure employment. I have been turned down from jobs a number of times. While I have sought stints as window or car salesmen, employers do not want to hire me due to my conviction.
21. If permitted, I will travel to Russia with my 32-year-old son, Eli Kiperman, who will pay for its expense. Eli Kiperman is a prominent businessman who can easily afford it. He will also be visiting the gravesite with me.
22. I am suffering from depression and insomnia. I see a doctor (Irina Korobov) to address my psychological issues. I take antidepressants and sleeping pills for my conditions.

23. I have served seven (7) months of my term of supervised release without incident. I am a naturalized U.S. citizen.
24. Shortly after my arrest in 2016, I began cooperating with the government. I waived prosecution by Indictment and consented to proceeding by Information. My entire term of incarceration has been served without disciplinary incident.
25. The remainder of my days, I am looking to spend attending to my family and getting close with my children and grandchildren. I have two sons (Eli and Valentine) and a daughter Lisa in the States. I also have seven (7) grandchildren.
26. I may not have another chance to travel to Russia with Eli and care for my mother's grave.
27. I need a one month for travel. Eli and I will stay at a hotel in Moscow because we have no family or friend to stay with.
28. Therefore, I am respectfully asking for the Court to Modify the Conditions of my Supervised Release so that I may travel to Russia with my son Eli for the express purpose of visiting, tending to, and making necessary arrangements for the care of my mother's grave.

Dated: June 12, 2018
Brooklyn, New York


Boris Mayfeld

Sworn to before me this
12 day of June, 2018


NOTARY PUBLIC

NA ALIE SOTNIKOVA
Notary Public, State of New York
ID: 0150808
Qualified to Perform
Notarial Functions Through 7/20/18